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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SILVANO GONZALEZ-CASTRO,

Defendant.

Case No.: 2:19-cr-00130-APG-NJK

**Joint Stipulation to Continue
Government's Response to Defendant's
Motion to Dismiss (ECF No. 20), and
Defendant's Reply**

(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Silvano Gonzalez-Castro, that the government's response to defendant's motion to dismiss (ECF No. 20) currently due on Friday, August 9, 2019, be vacated and continued to August 21, 2019, with defendant's corresponding reply due on August 28, 2019.

This Stipulation is entered into for the following reasons:

1. Government counsel continues to need additional time to properly respond to defendant's motion, to include researching the issues raised by the defendant.

2. On August 6, 2019, government counsel received a copy of an audio recording from the defendant's Immigration Court proceeding. However, the recording is on an audio cassette tape, and the government has experienced delay in converting the recording to a format which it can review and provide to defense counsel. Government counsel has not yet been able to review this recording, which may be dispositive of the current motion.

3. Denial of this request for continuance could result in a miscarriage of justice.

4. This is the fourth request for continuance of the government response to defendant's motion to dismiss.

DATED this 9th day of August, 2019.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Monique Kirtley

By /s/ Jared L. Grimmer

MONIQUE KIRTLEY
Assistant Federal Public Defender

JARED L. GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SILVANO GONZALEZ-CASTRO,

7 Defendant.
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9

Case No.:2:19-cr-000130-APG-NJK

ORDER

10 IT IS THEREFORE ORDERED that the government's response to defendant's
11 motion to dismiss (ECF No. 20) currently due on Friday, August 9, 2019, be vacated and
12 continued to August 21, 2019, with defendant's corresponding reply due on August 28,
13 2019.

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15 DATED this 9th day of August, 2019.

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18 UNITED STATES MAGISTRATE JUDGE
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